

THIS OMNIBUS OBJECTION SEEKS TO RECLASSIFY AND DISALLOW CERTAIN FILED PROOFS OF CLAIM. CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON EXHIBIT 1 ATTACHED TO THE PROPOSED ORDER.

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Counsel to the Plan Administrator

In re:

BED BATH & BEYOND INC., *et al.*,¹
Debtors.

Chapter 11

Case No. 23-13359 (VFP)
(Jointly Administered)

**Hearing Date: July 1, 2025
Hearing Time: 10:00 a.m. (ET)
Response Deadline: June 24, 2025**

**ORAL ARGUMENT WAIVED UNLESS
RESPONSES ARE TIMELY FILED**

NOTICE OF OBJECTION TO YOUR CLAIM

TO: EACH CLAIMANT LISTED ON EXHIBIT A TO THE OBJECTION²

¹ The last four digits of Debtor Bed Bath & Beyond Inc.'s tax identification number are 0488. A complete list of the Debtors in these chapter 11 cases and each such Debtor's tax identification number may be obtained on the website of the Debtors' claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>.

Michael Goldberg, solely in his capacity as the Plan Administrator (the “Plan Administrator”) to 20230930-DK-Butterfly-1, Inc. (f/k/a/ Bed Bath & Beyond Inc.)³ and affiliated debtors (the “Debtors”) has filed the enclosed *Plan Administrator’s Eighteenth Omnibus Objection (Substantive) to Claims (Equity Claims)* (the “Objection”). Pursuant to the Objection, the Plan Administrator asks the Court to enter an order that: (a) finds that each Disputed Claim is not a “claim” against the Debtors’ estates but rather an “Interest” in BBB as defined by section 101(16) of the Bankruptcy Code and Article I.A.87 of the Debtors’ Second Amended Joint Plan (the “Plan”); (b) reclassifies each Disputed Claim as a Class 9 Interest pursuant to the Article III.B.9(a) of the Plan; and (c) holds that each Disputed Claim will be treated as a Class 9 Interest pursuant to the Plan, which provides, “Each Allowed Interest in BBB shall be canceled, released, and extinguished, and will be of no further force or effect and no Holder of Interests in BBB shall be entitled to any recovery or distribution under the Plan on account of such Interests.” Plan, Article III.B(9). You should look for your name on **Exhibit 1** attached to the Proposed Order (Exhibit A to the Objection) enclosed herewith and review the Objection carefully.

If you disagree with the Objection, you must file a response to the Objection with the Clerk of the Bankruptcy Court at the address below on or before **June 24, 2025**.

² In accordance with Local Bankruptcy Rule 3007-2, the Claims Agent served a separate copy of this Notice that was specifically tailored to each individual identified on Exhibit A to the Objection.

³ Pursuant to the *Certificate of Amendment of the Certificate of Incorporation of Bed Bath & Beyond Inc.*, which was filed with the State of New York Department of State on September 21, 2023, the name of the entity formerly known as “Bed Bath & Beyond Inc.” was changed to *20230930-DK-Butterfly, Inc.* [Filing ID No. 230921001833 DOS ID 315602].

Clerk of Court
United States Bankruptcy Court
for the District of New Jersey
Martin Luther King, Jr. Federal Building
50 Walnut Street
Newark, NJ 07102

At the same time, you must also serve a copy of the response upon the Plan Administrator's attorneys:

Robert J. Feinstein, Esq.
Bradford J. Sandler, Esq.
Paul J. Labov, Esq.
Edward A. Corma, Esq.
PACHULSKI STANG ZIEHL & JONES LLP
1700 Broadway, 36th Floor
New York, NY 10019

If you file a response, you or your attorney must appear at a hearing on the Objection that will be held before the Honorable Vincent F. Papalia on **July 1, 2025, at 10:00 a.m. Eastern Time** at the United States Bankruptcy Court, Courtroom No. 3B, Martin Luther King, Jr. Federal Building, 50 Walnut Street Newark, New Jersey 07102.

PLEASE TAKE NOTICE that parties may request to appear by Zoom or telephonically by sending an email to Chambers_of_vfp@njb.uscourts.gov by no later than 3:00 p.m. one (1) business day prior to the scheduled hearing.

IF YOU DO NOT RESPOND TO THE OBJECTION, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: May 27, 2025

/s/ Bradford J. Sandler

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